

1 William E. Peterson (NV Bar 1528)
2 Wayne Klomp, Esq. (NV Bar 10109)
3 C. Thomas Burton, Jr., Esq. (NV Bar 3030)
4 SNELL & WILMER L.L.P.
5 50 West Liberty Street, Suite 510
6 Reno, Nevada 89501-1961
7 Telephone: 775-785-5440
8 Facsimile: 775-785-5441
9 Email: wpeterson@swlaw.com
10 wklomp@swlaw.com
11 tburton@swlaw.com
12 *Attorneys for Plaintiff ShieldIO, Inc.*

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHIELDIO, INC.,

Plaintiff,

vs.

SIMON I. BAIN, an individual,

Defendant.

Case No. 3:19-cv-700-MMD-WGC

**STIPULATION AND ORDER
EXTENDING TIME FOR PLAINTIFF
TO RESPOND TO SIMON I. BAIN'S
MOTION TO DISMISS COMPLAINT
(FIRST REQUEST)**

Plaintiff ShieldIO, Inc. ("ShieldIO") and Defendant Simon I. Bain ("Bain"), through their counsel, hereby respectfully request the Court enter an order, pursuant to Local Rules IA 6-1 and 7-1 extending the time for ShieldIO to respond to Bain's motion to dismiss complaint (ECF No. 7) otherwise due December 27, 2019. The Parties request that the time be extended to January 27, 2020.

The Parties are currently involved in settlement discussions. Therefore, the stipulation and extension are made by the Parties in good faith for the benefit of each. The stipulation is made for the benefit of the Parties and the Court and not for any deleterious purposes nor to delay these proceedings.

1 Dated: December 19, 2019

2 BROWNSTEIN HYATT FARBER
3 SCHRECK, LLP

4 By: /s/ Matthew D. Francis
5 Matthew D. Francis (NV Bar 6978)
6 Arthur A. Zorio (NV Bar 6547)
5371 Kietzke Lane
Reno, NV 89511

7 KNOWMAD LAW
8 Christopher R. McElwain (CA Bar 289132)
9 *Pro hac vice to be submitted*
484 Washington St., B-313
Monterey, CA 93940

10 *Attorneys for Defendant Simon Bain*

Dated: December 19, 2019

SNELL & WILMER L.L.P.

By: /s/ Wayne Klomp
William E. Peterson (NV Bar 1528)
C. Thomas Burton, Jr. (NV Bar 3030)
Wayne Klomp, Esq. (NV Bar 10109)
50 West Liberty Street, Suite 510
Reno, Nevada 89501-1961

Attorneys for Plaintiff ShieldIO, Inc.

11
12
13
14
15
16 **IT IS SO ORDERED.**

17 

18 UNITED STATES DISTRICT JUDGE

19 DATED: December 23, 2019

20
21
22
23
24
25
26
27 STIPULATION AND ORDER EXTENDING TIME FOR PLAINTIFF TO RESPOND TO
28 SIMON I. BAIN'S MOTION TO DISMISS COMPLAINT